

The Law Offices of
ANDREW J. FRISCH, PLLC
40 Fulton Street, 17th Floor
New York, New York 10038
212-285-8000

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Filed via ECF

The Honorable Nicholas G. Garaufis
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Douglass Mackey, Criminal Docket No. 21-0080 (NGG)

Dear Judge Garaufis:

On behalf of Douglass Mackey, and without objection from the government, I write to request permission to file a memorandum of law in support of Mr. Mackey's motion to dismiss which I expect will exceed 25 pages. The motion is due this Friday. My current draft of the memorandum is about 30 pages. While revisions over the next two days may shorten or lengthen the draft, and while I will make best efforts to be concise and avoid repetition, my best estimate is that the final memorandum will exceed 25 pages, but be no more than 35 pages. I submit this motion today without knowing the precise page number rather than await the day of filing. The anticipated length of the memorandum is a consequence of the novel and important legal issues raised by the case. AUSA Paulsen has advised me that he does not object to this motion.

I appreciate the Court's consideration.

Respectfully submitted,

/s/ Andrew J. Frisch
Andrew J. Frisch

cc: AUSA Erik Paulsen
AUSA Olatokunbo Olaniyan
AUSA William Gullotta